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Subject: Round 3A SW FSP Comments
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Here are my comments on the surface water FSP. I will be providing comments on the lamprey FSP tomorrow.

-Jennifer

Page 5, Section 2.1, Data Needs: The new sampling plan calls for the near-shore samples to be increased in depth to a minimum of 10 feet. Although this new plan may meet the objectives of the FS and hydrodynamic/sediment transport model it moves away from meeting the objectives of characterizing amphibian and shallow water exposure areas. Source specific, near shore data under different seasonal conditions would also better help refine exposure estimates for these receptors.

Page 8, Section 2.2, Sample Types and Numbers: The new transect sampling scheme proposed by EPA that separately analyzes three composites from a transect sample (west side, center and east side) are shown for the transect at RM2 and RM23, but not at RM11. This information should also be gathered for RM11, otherwise there would be a good picture before and after the ISA, but not in the middle, where most of the sources would be attributing to water concentrations. This is important chemical characterization and loading from major source areas in the ISA would be lost by the single sample currently proposed, and this is the area that the most information would be gained from the three sample separation. There may be limitations during storm events to capture this location, but it seems like these extra samples wouldn't be difficult to get during the high flow sampling event.

Page 11, Section 2.3.1 and Table 2-1, XAD analysis: Why are some samples limited to PBCs (downstream of OSM, Time/oil, Linton Plywood, Marcom, Willamette Cove, Willbridge, Gunderson, Fire Boat, and UPRR)? The source ID samples should look at the full suite of COIs – there are other COIs that benefit greatly from the detection limit resolution provided by the XAD analysis as well as dissolved versus total distinction, esp. since some of these locations have not been sampled before. This data would be used in the ecological risk assessment for small home range exposures such as sculpin, small mouth bass, crayfish, and benthos.

Why are some samples in Table 2-1 only designated for certain uses (e.g. only the transect samples are proposed for use in the food web model, many identified for source ID will only look at PCBs, and some ISA samples around RM 10 and 2 are designated as background)? Was the data use for these samples already discussed at some point?

Page 18, Section 36, SW Sampling Procedures: The text states “surface water chemistry for nature and extent at each river transect will be determined by summing the results for each analyte or near-surface with near-bottom horizontal transect composite samples”. This information should be reported separately.

Table 2-4: The ACGs reported here should include the eco screening level values recently commented on by EPA. Why aren't the MDLs reported here for some analytes (SVOCs, chlorinated herbicides, metals)?